

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

AWARE PRODUCTS LLC D/B/A)	
VOYANT BEAUTY,)	
)	
Plaintiff,)	
)	No. 4:21-cv-249-SEP
v.)	
)	
EPICURE MEDICAL, LLC,)	
FOXHOLE MEDICAL, LLC,)	
LEE ORI, individually and as co-trustee)	
of the LEE E ORI & JACLYN C ORI)	
LIVING TRUST, JACLYN C. ORI,)	
as co-trustee of the LEE E ORI &)	
JACLYN C ORI LIVING TRUST,)	
DAN REILLY, SARAH SIMMERS,)	
CLOVER LEAF STRATEGIES, LLC,)	
PFL INVESTMENTS, LLC, and)	
NEO HEALTH, LLC,)	
)	
Defendants.)	

**REPLY DECLARATION OF ROBERT C. PENN JR. IN SUPPORT OF PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

I, ROBERT C. PENN JR., an attorney admitted pro hac vice to practice in the United States District Court of the Eastern District of Missouri, hereby declare that the following is true and correct under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney at Sher Tremonte LLP and counsel for Plaintiff Aware Products LLC d/b/a Voyant Beauty ("Voyant"). I submit this reply declaration in further support of Plaintiff's Motion for Summary Judgment.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the deposition of Defendant Lee Ori, dated March 24, 2022. Ori testified in his individual capacity and was the sole 30(b)(6) witness for Epicure Medical LLC and Foxhole Medical LLC.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the deposition of Defendant Dan Reilly, dated April 1, 2022.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the deposition of Defendant Sarah Simmers, dated March 29, 2022.

Dated: July 25, 2024
New York, New York

/s/ Robert C. Penn Jr.
Robert C. Penn Jr.